



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

Applicant: Guaranteed Organic Certification Agency (GOCA)
Program/Audit Type: National Organic Program – 2003 Annual Update
Location(s): 5464 Eighth St. Fallbrook CA
Audit Date(s): October 3-4, 2003
Audit File Number: NP3276DA NC
Action Required: Yes
Auditor(s): Steve Ross
Contact: Charles Heermans, Owner and Administrator
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AUDIT ACTIVITIES

On October 3-4, 2003, a representative of the USDA, AMS, LS Audit, Review, and Compliance (ARC) Branch conducted a review of annual update documents submitted by the Guaranteed Organic Certification Agency (GOCA) Fallbrook, CA to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP). Charles Heermans, Owner and Administrator of GOCA submitted requested information on August 15, 2003. ARC Branch Checklist 1025C was used as a basis for determination of compliance with the NOP Rule. Information submitted by GOCA included:

- List of certified operations: 300 clients (80 processor/handler, 1 Livestock, 10 Wild Crops and 200 crops) located in CA, CO, FL, HI, IL, OR and WY as well as countries Brazil, Ecuador, Mexico and Nicaragua. GOCA wishes to expand to AZ, ID, NM, and NV and these countries: Argentina, Chili, Columbia, Costa Rica, India, Paraguay, Peru, Thailand and Uruguay.
- Three certification files of each type of operation certified (processor/handler and crops along with the only livestock).
- Performance evaluations of GOCA Staff.
- Current conflict of interest disclosure report.
- Annual Program Review.
- New Articles of Incorporation for State of CA, by-laws and date of establishment-February 6, 2003-Still remain a for profit company
- Fee Schedule
- New policy and administrative procedures manuals
- Copy of current certificate issued to clients
- OSP and Inspection questionnaire used by GOCA
- JAS accreditation

GOCA has changed the name of the company since the incorporation to **GOCA, INC, DBA GOCA**. The address and policies and procedures remain the same along with the owner and administrator. GOCA had not conducted any laboratory analysis on any clients. GOCA maintains training records on in-house training and records showed that inspectors/reviewers had received training on NOP. GOCA has been granted JAS approval status.

FINDINGS

The review of all material submitted by GOCA for the annual update as required by the NOP Final Rule shows that two (2) Hold Points (HP) and one (1) Continuous Improvement Point (CIP) were found.

NP3276DA.NC1 (HP) 205.201(a)(5). Physical barriers established ...to prevent contact of organic production ...with prohibited substances. *The inspection of the Kelly Ranch found that the client had used the substance Roundup within ten (10) feet of the orchard trees. The conditions set by GOCA only requested the ranch to "fix the current contamination prevention plan since the plan of not using prohibited materials on the first rows of non-organic production appeared to not be working." GOCA also only asked for the client to provide a copy of the pesticide user's number and pesticide use permits. GOCA did not require removal of the land for organic production or the removal of any contaminated product. GOCA certified the ranch on September 19, 2002 after the ranch answered the conditions. The CA submitted by the ranch did not address the need for removal of the land or products.*

NP3276DA.NC2 (HP) 205.404 (a). ...if the certifying agent determines that the organic system plan and all procedures and activities of the applicant are in compliance with this part... the agent shall grant certification. *GOCA has numerous conditions imposed on the client that are not in compliance with the Rule. GOCA's inspection checklist automatically generates conditions based upon the finding in the checklist. GOCA has made these conditions requirements for certification. Examples are:*

- *Requiring soil and water tests from the client*
- *Complaint logs to be kept and identifies this as Guide 65 requirement. (GOCA indicates that they are in the process of Guide 65 application, but no indication that Guide 65 accreditation has been granted) All client files reviewed showed no indication that any client was requesting Guide 65 certification*
- *Requirements to meet the EU 2092/91 rule. Again no indication that clients were requesting certification to an international standard.*
- *Requirements for bathrooms and hygiene standards for applicants*
- *Requiring clients to have employees sign GOCA "highlights for certification standards"*

NP3276DA.NC3 (CIP) 205.642. ...requires the certifying agent to supply the client with an estimation of costs for certification and the cost of continued certification. *The GOCA policy manual dated May 2003 states that "at the request of the applicant, GOCA will provide a quotation for all services. This is documented on pg 14 and pg 23 of the manual.*

RECOMMENDATIONS

I recommend that GOCA accreditation be continued with surveillance by appropriate members of the USDA. I also recommend that GOCA submit corrective action to the non-conformances listed in a timeframe established by the USDA.